

Modernisation of the Victorian Regional Forest Agreements

Submission by Save Our Strathbogie Forest Inc. - July 6, 2019.

Summary

RFAs have comprehensively failed to deliver on all key outcomes and should not be renewed. State and Federal governments are out of touch when it comes to community views on forests. Fixing the RFAs, or doing away with them altogether, is an opportunity for change.

If RFAs are renewed:

- Logging in native forest should not be exempt from national environmental law.
- CAR reserve targets (shortfalls) should be fully met.
- Native forest logging should be 100% transitioned to hardwood plantations and recycled fibre.
- Management of native forests should have regard for all forest values and particularly climate change.
- Traditional Owner values and priorities should be embedded in native forest management.

1. What changes have you seen in the RFA regions?

The RFAs saw the introduction of clear-fell logging (seed tree logging) to mixed species forests in the Strathbogie Ranges, which resulted in the worst logging coupe regeneration failure locals had ever seen. Rehabilitating the failed coupe ('Ferraris') cost substantial amounts of taxpayer money, requiring several regeneration attempts, hand planting and complete deer-proof fencing of the entire coupe. What was previously HCV native forest has been turned into a hardwood plantation with significantly degraded understory and ground-layer vegetation.

More broadly, since the five Victorian RFAs were signed, some forests have burnt in tragic, large bushfires and the impacts of climate change are happening right before our eyes. Native forest logging in Victoria is unviable and unsustainable, with State Government loggers, VicForests, routinely bailed out by taxpayers.

Forests are increasingly being logged for low quality end use product such as pulp, pallets and firewood. In the Benalla region, firewood is explicitly marketed as an important product of logging high conservation value forest.

2. What should the Victorian RFAs aim to achieve over the next 20 years?

If RFAs are renewed,

- They must complete the logging industry's transition out of native forests. The RFAs must make the switch from managing forests for woodchips to managing them for carbon and other ecosystem services.
- They should aim to contribute as much as possible to a Comprehensive, Adequate and Representative reserve system on public and private land, using those mechanisms recognised by the National Reserve System as appropriate forms of legal protection.
- They should ensure that Victoria's forests are being managed for key ecosystem services such as carbon sequestration, water yields and pollination, and the relative value of such services compared with alternative, commercial forestry uses.

3. What are the potential improvements you think should be made?

Our forests should be managed for the best use and highest value: this means managing natural values and climate resilience.



The independent consultation paper is clear that “more effort is needed to stop the overall decline of forest-dependent threatened species and improve the extent and condition of forest habitats” (p.7). On public land, appropriate land uses should be reviewed with regards to meeting all three RFA objectives, particularly in those regions and bioregions identified as priorities for increased protection by VEAC (2017).

Relevant information from each of the CMA’s climate-adaptation plans should also be considered as part of the assessment of public-land forests which should be managed primarily for their ecosystem-service values and resilience capacity in the context of climate change.

4. How could the potential improvements in the consultation paper help modernise the Victorian RFAs?

The paper explicitly recommends that Victoria’s RFAs should support Matters of National Environmental Significance under the Commonwealth’s *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act—our nation’s current environment law) (see p.8, p.44). The best way for the RFAs to support Matters of National Environmental Significance, like Federally-listed species and their forest habitat, is to make logging subject to this law—which, under the current RFAs, it is not.

There is a good scientific evidence that mature forests increase water yields and carbon sequestration and help improve the resilience of ecosystems in the context of climate change.

5. Do you have any views on which potential improvements are most important?

The top four potential improvements identified in the consultation paper are:

1. Recognising all forest values
2. Conserving forest biodiversity and maintaining ecosystem health
3. Addressing climate change and other large-scale disturbances
4. Promoting Traditional Owner rights and partnership

There is still a 2.1 million hectare gap in Victoria’s reserve system on public and private land to meet the CAR targets. Delivering on this gap is fundamental to ensuring biodiversity protection in Victoria, as recognised in Victoria’s Biodiversity Plan.

6. How do you use forests in your region?

SOSF is active in forest advocacy, survey and research and community engagement. We partner with Traditional Owners, Local Government and other community groups to promote the values of native forest and the the threats posed by logging. We advocate for the economic and ecological opportunity that protected native forests offer.

7. How could the RFAs better provide for multiple forest uses (i.e. recreation, conservation, livelihood and economy)?

Current ‘multiple use’ policy is a misnomer. The policy is consistently interpreted by the Victorian Government in favour of the native forest logging industry. There is ample publicly available evidence that logging is given priority over recreation, conservation and livelihood.

Recreation and conservation are best supported when forests are left standing, and are not logged—and this is good for livelihoods and the broader economy, as well. Millions of dollars would be

injected into the communities that used to depend on native logging through the creation of additional parks and reserves to meet CAR targets.

8. What are your views on existing environmental protections afforded across the entire forest estate (including parks, reserves and State forests) through the RFAs?

Existing environmental protections are clearly inadequate. As the consultation paper points out, “biodiversity continues to be lost from Victoria and further effort is needed to halt and reverse the decline” (p.43). Victoria has 485 forest-dependent species listed as threatened under the state’s *Flora and Fauna Guarantee Act 1988*. The Greater Glider was added to this list two years ago—but is *still without* the legally required Action Statement to support the species’ recovery.

The NE FMP which underpins the NE RFA has never been reviewed for efficacy and many of the threatened species protections were never fully implemented. We have documented this for Powerful Owls in the NE RFA and suggest similar failings for other threatened species. The RFA process for threatened species protection has been an utter failure.

9. How could the environmental protections be improved?

The logging industry’s exemption from national environment law must end, and all forest values and uses must be recognized and supported.

Implement the necessary CAR reserve additions, as suggested, for example, for the Central Victorian Uplands, by VEAC (2017).

RFAs currently include both ‘formal’ and ‘informal’ reserves within the CAR Reserve definition, even though the ‘informal’ reserves such as Special Protection Zones are not recognised by the NRS, nor by VEAC (2017). This causes confusion and allows ambiguity when assessing levels of protection for different vegetation/habitat types. Formal CAR reserves should have criteria and be created such that they are consistent and recognized by the NRS.

10. What opportunities could the RFAs provide to support access to and traditional use of forests by Traditional Owners and Aboriginal people?

RFAs must support the aspirations of Traditional Owners for country, including for access and traditional use, and support the fundamental right of Traditional Owners to claim title. Where Traditional Owners and Aboriginal people want co-, joint- or sole-management of forests, RFAs should support and facilitate agreement making with government on those matters that meet the aspirations of Traditional Owners.

11. How could the RFAs enable the legal rights of Traditional Owners to partner in land management and seek economic and cultural opportunities to be realised in future forest management?

RFAs should enable, and not obstruct or constrain, ongoing processes of consultation and negotiation between government and Traditional Owners. This includes for the identification, creation and management of new parks and reserves, and for Traditional Owner-directed land management, including the broader cultural landscape and ecosystem processes. Traditional Owners should rightly benefit from any economic values, or systems accounts that may be developed for carbon, water, tourism or other values. Government consultation and agreement with relevant Traditional Owner groups over the naming of new parks and reserves (and other areas) is strongly supported.

12. How could the RFAs consider climate change and other large-scale natural disturbances (including bushfires)?

RFAs should rule out logging regimes (like clear-fell and seed-tree) that clearly make forests more flammable and fire-prone. The current model of forest management is not adaptive to climate change or major bushfires—as can be seen by the failure of governments and VicForests to respond to the impacts of the tragic 2009 Black Saturday bushfires. In that case, wood volumes were not reduced until 2017/18, and then only to the sawn timber sector (Nippon’s Australian Paper is still delivered vast quantities of wood to pulp for paper, despite the impact of the bushfires).

Research on Eucalypt regeneration potential following forest disturbance (eg fire, logging), in light of climate change projections, indicates how untenable current logging techniques are likely to be within our lifetimes (eg Nitschke and Hickey 2007). There needs to be additional investment in understanding the threat that logging poses to our native forests as new CC projections emerge.

The RFAs should take into account the valuable carbon stocks and flows in Victoria’s native forests, which are among the richest and safest stores of carbon anywhere on Earth. Every time a forest is logged, carbon is released into the atmosphere, making climate change worse and destroying the only safe, proven, cheap and reliable technology we have for sucking carbon dioxide out of the atmosphere—forests. The RFAs must properly value and account for carbon, and the critical role forests play in mitigating climate change when they are left standing.

13. How could the RFAs better address industry sustainability?

Transition all native forest logging to hardwood plantations!

The consultation paper couldn’t be clearer: “RFAs have not provided long-term stability of supply for the timber industry” (p.44). As the bulk of the forests managed under RFAs are woodchipped and pulped for paper, sawmills across the state have closed. When the RFAs were signed, there were half a dozen sawmills in a small town in East Gippsland called Cann River. Today there are none.⁹ In Buchan, also in East Gippsland, there were three. Today, there are none. Under RFA management, the sawmill in Alexandra, which employed 44 people, closed. It’s clear that RFAs have overseen the reduction of the sawn timber sector, while vast pulp volumes, which have a much smaller job ratio, continue. The RFAs could address industry sustainability by completing the transition of the pulp sector out of native forests and into existing and new plantations, and recycled fibre. The only way to ensure a sustainable future for our forests, and the communities that rely on them, is to complete the transition away from native forests and to diversify into existing and new plantations, and manage forests for ecosystem services like carbon, clean air and water, as well as for recreation, tourism and conservation.

14. How could the RFAs encourage investment and new market opportunities for forest-based industries (including the forests and wood products industry, tourism, apiary and emerging markets such as carbon)?

The RFAs need to end the special treatment logging has enjoyed for decades, and make it subject to national environment law.

RFAs should provide for the full range of forest-dependent businesses and industries. Right now, apiarists are losing important bee-foraging sites when forests are logged and burnt. Tourism operators are losing access to important forest trails for walking, bike riding horse riding—because tourists don’t visit a forest to enjoy the clearfells. And we all lose out every day our forests are logged because logging steals water from rivers and drinking water reservoirs, and causes climate change.

Ending logging in high conservation value forests is the best way for RFAs to encourage investment and new market opportunities for forest-based industries. And when it comes to the logging industry itself, the best way for the RFAs to encourage investment and new market opportunities is to

transition the industry to plantations and recycled fibre, and require Victorian logging to exceed the requirements of the credentialed FSC Full Forest management certification standard. It makes sense to invest in tourism for the region going forward.

15. How can the RFAs support the adaptive management of Victoria’s forests in response to emerging issues (e.g. major bushfires) and opportunities (e.g. emerging industries)?

Removing logging from Victoria’s high conservation value forests is essential in responding to the impacts of bushfire and climate change and for preventing these from getting worse.

16. What areas of research would better equip us to sustainably manage Victoria’s forests?

Applying existing research findings, which has not occurred, would be a good start. Long-term monitoring programs show what’s needed to better manage our forests—whether for wildlife, water or carbon. The consultation paper recommends interacting with scientists and other knowledge-holders, and identifying risks (p.45). However that’s not sufficient—actually applying the science and knowledge to make change is critical. Credible, peer-reviewed research shows that removing logging from native forests is key to managing them sustainably.

17. How could RFA monitoring, review (including five-yearly reviews) and reporting arrangements be improved?

Any review of the RFAs needs to be credible. Reviews need to happen far more regularly than every five years and there should be triggers for interim reviews, too. With animals constantly being added to threatened species lists, climate change impacts already being felt, bushfire events more intense and more frequent, and timber and paper markets changing, we need to be able to properly review the RFAs—if they continue—at least every three years, and more often when there’s a major change in the environment or in the markets. The consultation paper recommends a key element for improvement would be: “identifying thresholds in environment states that may trigger manager responses” (p.45). The community needs to have confidence that our forests are being responsibly managed. Truly ‘modernised’ RFAs must measure whether the forests can withstand ongoing logging—how much wood is really left and can governments and industry guarantee it can be logged without impacting high conservation values (like threatened species habitat and old growth)? How are the RFAs ensuring forest management is helping solve the climate challenge—and not making climate change worse? Under the RFAs, how are key tourism values and sites supported? Monitoring and reviewing needs to audit what the RFAs are achieving, but also whether they are fit for purpose in the changing external (social, economic and ecological) environment. And who does the audits is critical, too, as 20 years of failed RFAs tell us that governments are not able to properly monitor and report on what’s going on in our forests. They’ve turned a blind eye to the evidence for too long, and kept logging despite the collapse of ecosystems, the closure of sawmills, and market and society demands for truly sustainable products and for forest protection.

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